



KROWN LAW

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30 March 2022

VIA ECF

Hon. J. Paul Oetken, United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, New York, NY 10007

Re: *Garg v. Wang*, 21-CV-07716-JPO-BM | Defendant's Sixth Letter-Motion for an Extension of Time to Respond to Plaintiff's First Amended Complaint (Upon Consent and Joint Submission)

Dear Judge Oetken:

The Court accepted Plaintiff's filing of an amended complaint in this case (Doc. 16) on 1 February 2022. On or about 9 March 2022, the Court granted Defendant's fifth letter-motion for an extension of time to respond to the amended complaint by pleading, motion, or otherwise.

For good reason, including good-faith settlement negotiations between the parties, and the related joint resolution of an issue with a third party, Defendant seeks a further extension of the deadline for responding to the amended complaint, from 31 March 2022 to **21 April 2022**. My understanding is that the parties continue to work through their proposed agreement on their own, consulting counsel at various points, but anticipate concluding this by April 21. Should the case remain unresolved at that time, Defendant's counsel will likely file a motion to withdraw or a dispositive motion (or notify the Court as to reliance on the earlier motion).

Plaintiff's counsel provided notice of progress and consent to this extension via email correspondence on 28 March 2022.

Thank you for your attention.

Yours sincerely,

s/Charles J. Borrero/

Charles J. Borrero, Esq.
Attorney for Defendant

CC: Steven M. Richman (Via ECF)